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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GARY DAVIS and SCOTT SCRIBNER,

Plaintiff,

vs.

UNIVERSAL HEALTH SERVICES INC., a
Delaware Corporation; UHS OF DELAWARE,
INC., a Delaware Corporation; VALLEY
HEALTH SYSTEM, LLC, a Delaware Limited
Liability; SODEXO, INC. dba SODEXO USA,
a Delaware Corporation; SODEXO
AMERICA, LLC dba SODEXO USA, a
Delaware Limited Liability; SODEXO
OPERATIONS, LLC dba SODEXO USA, a
Delaware Limited Liability; and SDH
SERVICES WEST, LLC dba SODEXO USA,
a Delaware Limited Liability,

Defendants.

CASE NO.

COMPLAINT FOR DAMAGES AND OTHER
RELIEF BASED UPON:

1. AGE DISCRIMINATION IN VIOLATION
OF THE AGE DISCRIMINATION IN AGE
DISCRIMINATION IN EMPLOYMENT
ACT OF 1967
2. SEX DISCRIMINATION IN VIOLATION
OF THE CIVIL RIGHTS ACT OF 1964
3. DISABILITY DISCRIMINATION IN
VIOLATION OF THE AMERICANS WITH
DISABILITIES ACT OF 1990

JURY DEMAND

1 Plaintiffs GARY DAVIS and SCOTT SCRIBNER (hereinafter collectively "Plaintiffs" or
2 individually "Plaintiff Davis" or "Davis" and "Plaintiff Scribner" or "Scribner") alleges as follows:

3 1. This action is brought pursuant to the provisions of the Age Discrimination in
4 Employment Act of 1967, as amended, *29 USC §621, et seq.* (hereinafter "ADEA"), Title VII of
5 the Civil Rights Act of 1964, *42 USC §2000e*, et seq. (hereinafter "Title VII") and the Americans
6 With Disabilities Act of 1990, 42 U.S.C. §12101, et seq. (hereinafter "ADA") to obtain relief for
7 Plaintiffs for discriminating against them in the terms, conditions or privileges of their
8 employment and refusing to hire them based on their age, sexual orientation and/or disability.

9 2. At all relevant times, Defendants UNIVERSAL HEALTH SERVICES INC., a
10 Delaware Corporation; UHS OF DELAWARE, INC., a Delaware Corporation; VALLEY
11 HEALTH SYSTEM, LLC, a Delaware Limited Liability; SODEXO, INC. dba SODEXO USA, a
12 Delaware Corporation; SODEXO AMERICA, LLC dba SODEXO USA, a Delaware Limited
13 Liability; SODEXO OPERATIONS, LLC dba SODEXO USA, a Delaware Limited Liability; and
14 SDH SERVICES WEST, LLC dba SODEXO USA, a Delaware Limited Liability (hereinafter
15 "UHS", "Sodexo" or collectively "Defendants") employed more than twenty (20) employees, and
16 they are therefore subject to the provisions of ADEA, Title VII and the ADA.
17

18 3. Jurisdiction is predicated on the ADEA, Title VII and the ADA code sections
19 referenced above as well as *28 USC §1331*, as this action involves a federal question.

20 4. The events or omissions giving rise to Plaintiffs' claims occurred in this judicial
21 district, thus venue is proper here pursuant to *28 USC §1391(b)(2)*, and the ends of justice so
22 require.

23 **PARTIES**

24 5. At all relevant times herein Plaintiff Davis, was a citizen of the United States and
25 resident of the State of Nevada, County of Clark and City of Las Vegas.

26 6. At all relevant times herein Plaintiff Scribner, was a citizen of the United States and
27 resident of the State of Nevada, County of Clark and City of Las Vegas.
28

1 Director, General Manager and Senior General Manager and has received performance appraisals
2 that were either above expectations or meets expectations and he did not have any disciplinary
3 counseling's in his personnel file with Sodexo.

4 14. Sodexo was contracted to provide food service for four hospitals in the Las Vegas
5 market. On or about November 5, 2019 Sodexo was notified by UHS Hospitals that they were
6 terminating their food service contract with Sodexo for all of its hospitals in the Las Vegas market.

7 15. In November 2019 all the management jobs occupied by Sodexo managers were
8 posted on the UHS website making it incumbent on all Sodexo managers to apply for the jobs they
9 held at Sodexo if they wanted to be employed by UHS hospitals.

10 16. From in or around November 2019 to in or around March 2020 Davis applied for
11 seven or eight Clinical Nutrition Manager or Patient Service Manager positions listed on the UHS
12 website and received an email for Jason Silk, Senior Director of Contract Services for UHS who
13 was in charge with directing the transition of managers from Sodexo to UHS, saying among other
14 things, that "based on your background and reputation, it sounds like you are someone we would
15 like to join UHS".

16 17. From in or around November 2019 to in or around September 2020 Scribner
17 applied for five Food Service Manager positions listed on the UHS website but neither Davis or
18 Scribner received an interview for any of the positions they applied for.

19 18. As it turned out Plaintiffs were the only ones who were managers at the Sodexo
20 units that were not offered a job at UHS even though they had superior qualifications and
21 experience compared with the managers who were offered a job.

22 19. Sodexo participated in UHS's decision not to interview or hire Plaintiffs by giving
23 them negative references and informing UHS of their ages, sexual orientations and disabilities.
24 This is supported by the fact, among other things, that the Vice President for the Western Region
25 at Sodexo made a derogatory remark against Plaintiff Scribner's sexual orientation by saying that
26 "he was not aware that Las Vegas had so many 'Snowflakes'".
27
28

FIRST CAUSE OF ACTION

**(For Age Discrimination in Violation of the Age Discrimination
in Employment Act of 1967 against all Defendants)**

20. Plaintiffs Davis and Scribner incorporate the allegation set forth in paragraphs 1 through 19, inclusive, as if fully set forth herein.

21. This cause of action is brought pursuant to ADEA to obtain relief for Plaintiffs for discriminating against them in the terms, conditions or privileges of their employment because of their ages in violation of the ADEA.

22. As set forth above Plaintiffs Davis and Scribner are 63 and 61 years of age respectively and were the only managers who worked at Sodexo who were not offered a job at UHS. In addition they were substantially older than the managers who were offered a job at UHS.

23. As further set forth above, Plaintiffs Davis and Scribner had an outstanding employment history with no disciplinary actions and had the best qualifications and experience of all of the managers at Sodexo who were hired at UHS and because they were substantially older than the managers who were offered a job at UHS it is reasonable to infer that the reason they were not offered a job at UHS was because of their ages.

24. As a direct, foreseeable, and legal result of Defendants' Age Discrimination, Plaintiffs have suffered, overall economic losses in earnings, bonuses, job benefits and expenses, in an amount to be proven at trial which exceeds the minimum jurisdictional limits of this Court.

25. The age discrimination by Defendants was willful and thus Plaintiffs should be awarded liquidated damages pursuant 29 USC §626(b).

26. As a further direct, foreseeable, and legal result of the Defendants' age discrimination, Plaintiffs have suffered indignity, mental anguish, humiliation, emotional distress, nervousness, tension, anxiety, recurring nightmares, depression, inconvenience and loss of enjoyment of life and other pecuniary losses, the extent of which is not fully known at this time, for which they seek damages in an amount in excess of the minimum jurisdictional limits of the

1 Court, also to be proven at the time of trial.

2 27. In acting as they did, Defendants knowingly, willfully, and intentionally acted in
3 conscious disregard of Plaintiffs' rights. Their conduct was despicable, has subjected Plaintiffs to
4 oppression, and it warrants an award of punitive and exemplary damages in favor of Plaintiffs, in a
5 sum according to proof at trial.

6 28. Plaintiffs claim the damages alleged herein, together with prejudgment interest as
7 provided by law, in a sum according to proof at trial.

8 29. Plaintiffs have incurred, and continue to incur, attorney's fees in the prosecution of
9 his claim and Plaintiffs therefore seeks an award of reasonable attorney's fees, in a sum according
10 to proof at trial.

11 **SECOND CAUSE OF ACTION**

12 **(For Sex Discrimination in Violation of Title**

13 **VII of the Civil Rights Act of 1964 against all Defendants)**

14 30. Plaintiffs Davis and Scribner incorporate the allegation set forth in paragraphs 1
15 through 29, inclusive, as if fully set forth herein.

16 31. This cause of action is brought pursuant to Title VII to obtain relief for Plaintiffs for
17 discriminating against them in the terms, conditions or privileges of their employment because of
18 their sex orientation in violation of Title VII.

19 32. As set forth above Plaintiffs Davis and Scribner are both gay white males and were
20 the only gay male managers who worked at Sodexo who were not offered a job at UHS.

21 33. As further set forth above, Plaintiffs Davis and Scribner had an outstanding
22 employment history with no disciplinary actions and had the best qualifications and experience of
23 all of the managers at Sodexo who were hired at UHS and were the only managers not offered a
24 job at UHS, leading to the reasonable inference that the reason they were not offered a job at UHS
25 was because of their sexual orientation.

26 34. As a direct, foreseeable, and legal result of this discrimination because of their
27
28

1 sexual orientation, Plaintiffs have suffered, overall economic losses in earnings, bonuses, job
2 benefits and expenses, in an amount to be proven at trial which exceeds the minimum
3 jurisdictional limits of this Court.

4 35. As a further direct, foreseeable, and legal result of this discrimination because of
5 their sexual orientation, Plaintiffs have suffered indignity, mental anguish, humiliation, emotional
6 distress, nervousness, tension, anxiety, recurring nightmares, depression, inconvenience and loss
7 of enjoyment of life and other pecuniary losses, the extent of which is not fully known at this time,
8 for which they seek damages in an amount in excess of the minimum jurisdictional limits of the
9 Court, also to be proven at the time of trial.

10 36. In acting as they did, Defendants knowingly, willfully, and intentionally acted in
11 conscious disregard of Plaintiffs' rights. Their conduct was despicable, has subjected Plaintiffs to
12 oppression, and it warrants an award of punitive and exemplary damages in favor of Plaintiffs, in a
13 sum according to proof at trial.

14 37. Plaintiffs claim the damages alleged herein, together with prejudgment interest as
15 provided by law, in a sum according to proof at trial.

16 38. Plaintiffs have incurred, and continues to incur, attorney's fees in the prosecution of
17 their claims. Plaintiffs therefore seek an award of reasonable attorney's fees, in a sum according to
18 proof at trial.

19
20 **THIRD CAUSE OF ACTION**

21 **(For Disability Discrimination in Violation of the Americans**
22 **with Disabilities Act of 1990 against all Defendants)**

23 39. Plaintiffs Davis and Scribner incorporate the allegation set forth in paragraphs 1
24 through 38, inclusive, as if fully set forth herein.

25 40. This cause of action is brought pursuant to the ADA to obtain relief for Plaintiffs for
26 discriminating against them in the terms, conditions or privileges of their employment because of
27 their disabilities in violation of the ADA.
28

1 41. As set forth hereinabove, Davis was diagnosed with an anxiety condition and
2 Scribner was diagnosed with lumbar radiculopathy and spinal stenosis.

3 42. These ailments qualify as physical and mental impairments under the ADA.
4 Further they substantially limited Plaintiffs in performing major life activities, including but not
5 limited to working, and thus qualified Plaintiffs Davis and Scribner as being disabled under the
6 ADA.

7 43. Further Plaintiffs Davis and Scribner were both qualified individuals with a
8 disability under the ADA because with or without accommodations they could perform the
9 essential functions of the jobs they were attempting to be hired for.

10 44. Thus as set forth above Plaintiffs Davis and Scribner are qualified individuals with a
11 disability under the ADA.

12 45. As further set forth above, Plaintiffs Davis and Scribner had an outstanding
13 employment history with no disciplinary actions and had the best qualifications and experience of
14 all of the managers at Sodexo who were hired at UHS and were the only managers not offered a
15 job at UHS, leading to the reasonable inference that the reason they were not offered a job at UHS
16 was because of their disabilities.

17 46. As a direct, foreseeable, and legal result of this discrimination because of their
18 disabilities, Plaintiffs have suffered, overall economic losses in earnings, bonuses, job benefits and
19 expenses, in an amount to be proven at trial which exceeds the minimum jurisdictional limits of
20 this Court.

21 47. As a further direct, foreseeable, and legal result of this discrimination because of
22 their disabilities, Plaintiffs have suffered indignity, mental anguish, humiliation, emotional
23 distress, nervousness, tension, anxiety, recurring nightmares, depression, inconvenience and loss
24 of enjoyment of life and other pecuniary losses, the extent of which is not fully known at this time,
25 for which they seek damages in an amount in excess of the minimum jurisdictional limits of the
26 Court, also to be proven at the time of trial.
27
28

7 50. Plaintiffs have incurred, and continues to incur, attorney's fees in the prosecution of
8 their claims. Plaintiffs therefore seek an award of reasonable attorney's fees, in a sum according to
9 proof at trial.

12 WHEREFORE, Plaintiffs Davis and Scribner demand judgment against Defendants as
13 follows:

- 25 |||

26 |||

27 |||

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiffs demands a trial by jury in this action.

DATED: 1/4/2021

LAW OFFICES OF MICHAEL P. BALABAN

BY: /s/ Michael P. Balaban
Michael P. Balaban
LAW OFFICES OF MICHAEL P. BALABAN
10726 Del Rudini Street
Las Vegas, NV 89141

EXHIBIT

“A”

NOTICE OF RIGHT
TO SUE-
DAVIS/SODEXO

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Gary R. Davis**
9804 Great Bend Dr
Las Vegas, NV 89117

From: **Las Vegas Local Office**
333 Las Vegas Blvd South
Suite 5560
Las Vegas, NV 89101



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

487-2020-00924

Jessica E. Franco,
Investigator Support Asst

(702) 388-5013

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Tamara M. West

Digitally signed by Tamara M. West
 DN: cn=Tamara M. West, o=EEOC,
 ou=Director-LVLO,
 email=tamara.west@eEOC.gov, c=US

Tamara M. West,
Local Office Director

Date: 2020.08.25 08:25:52 (Date Mailed)

Enclosures(s)

CC:

Sylvia Mayfield
HR Manager
Sodexo Services LLC
3100 N. Tenaya Way
Las Vegas, NV 89128

EXHIBIT

“B”

NOTICE OF RIGHT
TO SUE-
DAVIS/UNIVERSAL
HEALTH SERVICES

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Gary R. Davis**
9804 Great Bend Dr
Las Vegas, NV 89117

From: **Las Vegas Local Office**
333 Las Vegas Blvd South
Suite 5560
Las Vegas, NV 89101



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

487-2020-00882

Juan N. Serrata,
Investigator

(702) 553-4459

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
- ☒ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

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On behalf of the Commission

MICHAEL MENDOZA

Digitally signed by MICHAEL MENDOZA
 DN: c=US, o=U.S. Government, ou=Equal Employment Opportunity Commission,
 email=MICHAEL.MENDOZA@EEOC.GOV, ou=2020050100111-45001002916257
 Date: 2020.10.06 09:30:37 -0700

for

Enclosures(s)

Tamara M. West,
Local Office Director

(Date Mailed)

cc.

Jessica Hill
Employment Counsel
UNIVERSAL HEALTH SERVICES, INC.
1000 Healthpark Dr., Building Three, Suite 400
Brentwood, TN 37027

EXHIBIT

“C”

NOTICE OF RIGHT TO SUE SCRIBNER/SODEXO

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Scott Scribner**
1421 Sunblush Ln
Las Vegas, NV 89117

From: **Las Vegas Local Office**
333 Las Vegas Blvd South
Suite 5560
Las Vegas, NV 89101



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

487-2020-00913

Saul Vazquez,
Investigator

(702) 553-4460

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

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MICHAEL
MENDOZA

Digitally signed by MICHAEL MENDOZA
 DN: c=US, o=U.S. Government, ou=Equal
 Opportunity Commission
 cn=MICHAEL MENDOZA
 0.9.2342.1.2.200300.100.1.1=45001002936757
 Date: 2020.10.22 09:32:18 -0700

for

Enclosures(s)

Tamara M. West,
Local Office Director

(Date Mailed)

cc:

Sylvia Mayfield
Human Resources Manager
SODEXO USA INC.
3100 N. Tenaya Way
Las Vegas, NV 89128

EXHIBIT
“D”
NOTICE OF RIGHT
TO SUE
SCRIBNER/UNIVERS
AL HEALTH
SERVICES

EEOC Form 161 (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Scott Scribner**
1421 Sunblush Ln
Las Vegas, NV 89117

From: **Las Vegas Local Office**
333 Las Vegas Blvd South
Suite 5560
Las Vegas, NV 89101



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

530-2020-02374

Ruth I. Ibarra,
Investigator

(702) 553-4468

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



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Tamara M. West
 On behalf of the Commission

Digitally signed by Tamara M. West
 DN: cn=Tamara M. West,
 o=EEOC, ou=Director-LVLO,
 email=tamara.west@eoc.gov,
 c=US
 Date: 2020.12.04 11:58:37
 -08'00'

Enclosures(s)

Tamara M. West,
Local Office Director

(Date Mailed)

cc:

UNIVERSAL HEALTH SERVICES INC.

Attn: Jessica Hill, Employment Counsel
1000 Healthpark Dr. Bldg. 3, Suite 400
Brentwood, TN 37027